

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL CARRABES,

Plaintiff,

v.

EXPEDITORS INTERNATIONAL OF
WASHINGTON, INC.,

Defendant.

Civil Action No. 1:24-cv-12142-AK

AFFIDAVIT OF MATT LITTLETON

I, Matt Littleton, hereby depose and state as follows:

1. I am over the age of twenty-one and give this affidavit of my own free will.
2. I make the statements contained in this Affidavit based on my personal knowledge. I am competent to testify as to all facts stated herein.
3. I am employed by Expeditors International of Washington, Inc. (“Expeditors”) as a District Manager in Expeditors’ Ellenwood, Georgia office.
4. Beginning in or around December 2024, I learned that Expeditors is receiving anonymous e-mail communications from an anonymous Proton e-mail account, identified as “Secure.Report secure.report.500@proton.me.”
5. Beginning on or about January 10, 2025, I became aware that employees are concerned for their safety, due to the nature of some of these e-mails.
6. A female employee who usually arrives to work early in the morning, around 5 a.m., notified Expeditors that she was concerned about whether it was safe to arrive in the early morning hours, when fewer people were present.

7. Expeditors informed her that security is on-campus 24/7 and that she could request an escort coming into the facility. Expeditors also let her know that she could reach out to her manager if she wanted to adjust her hours.

8. On or about January 13, 2025, another female employee notified Expeditors that she felt the statements in some of these e-mails were directed to all Expeditors employees and asked if she could work from home until things “returned to normal.”

9. Expeditors assured this employee that her district manager was up to date on any and all threats and would advise if any additional security is needed. Expeditors also notified her to let her manager know how she felt so that the manager could address any concerns.

10. On or about January 13, 2025, two employees notified Expeditors they are concerned about whether it is safe to go to the bathroom alone.

11. At that time, these employees had to exit the building to use the restroom because of repairs that were being made to the restrooms inside the facility.

12. Expeditors told these employees that security is on campus 24/7, and their manager told them that they go together, if they felt the need to.


13. As a result of these e-mails, we have held a Town Hall to let all employees and contingent workers know the steps we are taking in response and to inform employees of the resources available to them.

14. To date, Expeditors’ response has included providing weekly updates to employees, conducting active shooter training, and hiring off-duty Clayton County police officers as additional security at our facility.

15. Additionally, in light of the contents of these anonymous e-mails, which have escalated, Expeditors has hired armed, off-duty police officers to stay outside of my personal

residence from 7 p.m. to 7 a.m., and Expeditors has hired armed, off-duty police officers to stay outside the residences of two other individuals who have been specifically named in these anonymous e-mails.

Signed under the penalties of perjury this 31st day of January 2025.


Matt Littleton

CERTIFICATE OF SERVICE

I, Matthew J. Lynch, hereby certify that on this 4th day of February 2025, the foregoing document was filed electronically through the ECF system, is available for viewing and downloading from the ECF system, and will be sent electronically to all registered participants identified on the Notice of Electronic Filing and via first-class mail to all non-registered participants identified on the Notice of Electronic Filing.

/s/ Matthew J. Lynch

Matthew J. Lynch